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GALLATIN COUNTY
PLANNING OFFICE

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June 30, 1999

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Dear National Park Service:

Thank you for the opportunity to comment on the draft Winter Use Plan for Yellowstone Park. Given the seven-day timeframe for comments on a 500-plus-page document, we will limit our concerns to the information and analysis as they relate to the proposed action and, specifically, the plowing of the road from West Yellowstone to Old Faithful.

Generally, we do not find that the analysis and information that you use supports the preferred alternative. We base our concerns on inconsistencies between your statement of desired conditions, the data you provide, the criteria developed by the Park Service and a departure from the criteria developed at Idaho Falls in October 1998. We question your analysis of supporting data and information (or lack thereof) in the following areas:

- (1) Socio-economics;
- (2) Visitor experience;
- (3) Quiet;
- (4) Wildlife;
- (5) Air and Water Quality; and
- (6) Park infrastructure.

We use your own information provided in the document to entreat you to select a different proposed action.

(1) Socio-economics

The neighboring communities near Yellowstone Park provide many essential services to winter visitors. Gallatin County conducted a socio-economic survey of over 1,100 businesses in Bozeman, West Yellowstone and Big Sky in May 1999. We received responses from approximately 28% of those businesses. Lost sales to those businesses alone, if Yellowstone National Park winter visitations were to be prohibited, would total \$16,763,297. Total winter payroll of those businesses who responded is \$15,741,552.

As stated in your report, p. 74, "The indirect, and induced expenditures generated in the GYA by nonresidents visiting the parks in the winter months are estimated to be approxi-

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mately \$60,000,000." This figure represents a huge economic impact to the communities surrounding the park.

We cite p. 264 of your draft to highlight this impact:

"A loss of the regional expenditures by these nonresidents would lead to an overall reduction of \$14,700,000 in total economic output and 357 jobs in the 3-state area."

We strongly disagree with your summation that this is a "negligible negative impact." On the same page you state, "The main reason that visitors make the often long and expensive trip to see YNP, however, is not to dine in West Yellowstone or spend a night in a motel in Gardiner." The question we put to you is this: How many of the thousands of YNP visitors would come and enjoy the park if these services were not provided and available in West Yellowstone and Gardiner? According to our survey, close to 34,000 of those who do business in Gallatin County are winter visitors to Yellowstone Park. Many of these visitors are able to plan a winter vacation in Yellowstone because they know that necessary services are available in West Yellowstone.

We dispute the draft's analysis of the regional economy on pages 480 and 481, under "Unavoidable Adverse Impacts." You state on page 480 that:

"[I]none of these above impacts could be considered irreversible or long-term in the context of total economy [I]f it is the nature of business to start or to change course based on economic self-interest or survival!"

Tell that to the hundreds of businessmen and women who make their living by providing a snowmachine winter experience to park visitors. Whoever wrote this has no sensitivity to business concerns. As other alternatives are available that could avoid this adverse impact, your conclusion is absurd.

(2) Visitor Experience

When the National Parks system was instituted, one of the paramount reasons was to preserve natural treasures in the United States, for present and future generations to experience and appreciate. These visitors, as well as all Americans, have paid for these treasures to be preserved for many years, and deserve the utmost consideration when considering the future of Yellowstone.

You state on page 185:

"A 1998-99 survey of Yellowstone winter visitors found support for sound and emission standards on snowmachines, more information and interpretation, stricter enforcement of rules, and more trails and locations for recreation. Closing roads to oversnow vehicles, restricting groomed roads to snowcoaches, and plowing the road from West Yellowstone to Old Faithful gathered the least support among respondents [emphasis added]."

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The majority of winter visitors have told you that your preferred alternative is the one that they, the users and supporters of the park, prefer the least. In your words, they have shown "a consistent picture of very low support ... for the major management change contained in alternative B: plowing the road from West Yellowstone to Old Faithful." Draft Winter Use Plan/EIS, p. 266.

The winter visitors' primary reasons for traveling to Yellowstone are obviously not being taken into account under Alternative B. As stated in your draft plan on p. 191, "The most important qualities to visitors to the park are scenery, wildlife, and clean air." How much passing scenery can a park visitor traveling by shuttle bus enjoy, when there are 20 ft. berms of plowed snow on either side of the road? How much wildlife can the visitors observe in their natural state, when the park's animals will be avoidant of the sound, sight and smell of tour buses traveling down a plowed road with high berms of snow on either side? Nearly all visitors you surveyed "stated their support for oversnow mechanized access, as opposed to plowed roads or mass transit" Draft Winter Use Plan/EIS, p. 193. As we previously stated, fewer winter visitors surveyed stated a willingness to pay for winter car and bus access to Old Faithful, than the cost of paying for clean, quiet snowmobiles. Draft Plan, pp. 267-68.

You state that Alternative B is attractive because it provides an affordable opportunity for winter visitation. You cite the income level and demographics of winter visitors on page 183 (Freimund, et al. 1999) as "wealthy and highly educated." Even if you offered free mass transit based on means testing, how will these lower income people get to the park in the first place? Your analysis must include this.

There are existing, less expensive, or even free, alternatives. For example, visitors can choose any border trailhead or boundary to enter the park via snowshoe or cross-country skis.

Your analysis regarding visitor experience under Alternative B gives short shrift to the 1996 Littlejohn survey results listed on page 184, and the 1999 survey (p. 233) where visitor respondents reported "overall support for continued mechanized winter access to YNP." A preferred alternative, based on these surveys, would more accurately reflect visitor preference if it met the following criteria:

- (a) Limited winter visitors;
- (b) Allowed oversnow machine travel;
- (c) Reduced noise and pollution from snowmobiles;
- (d) Adopted a reservation system; and
- (e) Groomed more frequently.

Preferences for car access, affordability and plowed roads were not mentioned in this survey.

Your analysis observes that scenery and wildlife viewing would be lessened along the plowed road from West Yellowstone to Old Faithful under the preferred alternative. Your conclusion on page 303 states as follows:

"...[The preferred alternative will eliminate or detract from multiple critical characteristics of the desired winter experience for a large number of participants ... [and] plowing the road from West entrance to Old Faithful

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would create berms of snow that would detract from scenery viewing opportunities for many visitors."

Again, we question how your own analysis supports your preferred action.

(3) Quiet

We observed certain themes in your document; one being a lack of analysis and data where such information might not support your preferred alternative. In the area of "quiet," we found no information related to the decibels associated with shuttle buses, snowplows, and individual vehicles that would be permitted under Alternative B. We found no comparative analysis of the noise given off by these proposed activities along the corridor from West Yellowstone to Old Faithful with the present activities permitted. Further, we saw no analysis of the same activities compared to those noise levels of "clean green" snow machines. As we understood at Idaho Falls and read in this draft, "clean green" machines were proposed to be an action common to all alternatives.

We cite your 1999 winter visitor survey, which showed a willingness on the part of winter visitors to pay \$45 more for clean, quiet machines. We also quote Freimund et al., 1999, from p. 185 of your draft:

"A 1998-1999 survey of Yellowstone visitors found support for sound and emission standards on snowmachines, more information and interpretation, stricter enforcement of rules, and more trails and locations for recreation. Closing roads to oversnow vehicles, restricting groomed roads to snowcoaches, and plowing the road from West Yellowstone to Old Faithful gathered the least support among respondents."

Again, on page 232, the first paragraph on "Natural Quiet" demonstrates no mention of the noise levels generated by mass transit buses, plows or individual vehicles under Alternative B. The same is true for your sound analyses on page 306, Table 46 and page 200, Table 35. Your conclusion on page 307 again ignores the sound levels produced by the proposed activities of Alternative B.

(4) Wildlife

In our opinion, it is imperative that a Winter Use Plan meet the requirement for the preservation of wildlife. The information regarding wildlife in your Draft Winter Use Plan sheds light on the various impacts your proposed Alternative B would have on winter habitat, foraging patterns, and mortality rates of wildlife. Your map entitled "Winter Wildlife Habitat" clearly illustrates that the geothermal areas located near the road between West Yellowstone and Old Faithful are prime wintering areas for much of the park's wildlife. On page 128, you state that "ungulates can be displaced from wintering habitats near roads and facilities. This includes elk, moose, and big horn sheep." On page 129, you state that the lynx, wolverine, fisher, marten, bobcat, river otter, red fox, and coyote have low population densities in the park and are vulnerable to human use of the park, especially during the winter. On page 135, you cite the vulnerability of the bald eagle to human activities from developments and motorized travel, as well as the high potential for "vehicle/ eagle collisions ... because eagles are

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known to forage on road-kill carcasses." As you noted, the severity of Yellowstone winters, coupled with depleted energy levels, low food supply, and the interruption of patterns of movement (by high berms of snow, traffic, and plowing and grooming operations), add up to significant "costs" to wildlife. In several instances throughout your draft plan, you list the possibility of vehicle/wildlife collisions as a major factor in wildlife mortality.

"Chronic harassment in cold weather can result in reduced reproductive rates and may significantly increase mortality [of wildlife]." Draft Winter Use Plan, p. 123. Those visitors surveyed cited that their first reason for winter visitation of the park was to view wildlife. If the number one reason the majority of winter visitors surveyed state that they come to Yellowstone to view wildlife, does that not lead to a greater potential for "chronic harassment," intentional or unintentional? Will animals pay the cost of bus and vehicle travelers' desire to see wintering wildlife? Will wildlife be forced to travel greater distances for food and water, to accommodate plowed roads? Will they be driven to other areas to survive, in order to avoid winter park visitors who are not familiar with their needs and habits?

These are all important questions which need to be addressed, when considering the needs of some of the park's most precious resources. They will, in the end, rely on us to ensure that their environment is protected to the utmost of our human ability.

(5) Air and Water Quality

We again observed the lack of analysis and data to support the proposed activities from West Yellowstone to Old Faithful under Alternative B. Again, you failed to compare air quality impacts where "clean green" machines are required, to the proposed activities.

We cite from p. 80 of your draft as follows:

"...The most commonly raised air-quality related health concerns in the GYA are tied to smoke and vehicle emissions [emphasis added]. Air pollutants called particulate matter include dust, dirt, soot, smoke and liquid droplets directly emitted into the air by sources such as power plants, vehicles, construction activity, fires and natural windblown dust."

On page 481 of your draft document, you state that all alternatives present the potential for impacts, including those on air quality, which are "short-term (for the duration of the causal factor) and minor." You have provided no science to support your claim that these potential impacts are either short-term or minor.

You also state on page 481 that a "definitive cumulative impact analysis would be conducted later when site-specific proposals are made and site-specific effects are determined." Your preferred Alternative B is nothing but "site specific!" Your logic evades us.

On page 235 of your draft, you discuss the impacts of snowmobile emissions on air quality in the park. On that same page, you omit data on the negative impacts of a potential increase in tour bus and vehicle emissions in the area between the West Entrance and Old Faithful. Nor do you discuss the potential, positive impacts that "clean, green" snowmobiles would pose in this equation. This is a notable omission.

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You stated on page 79 that winter visitors were more inclined to pay for clean and quiet snowmobiles (\$45 more than current cost) than they would pay for plowing the road from West Yellowstone to Old Faithful, and for bus and vehicle usage of that road in the winter (\$5 more than current cost). Above all, we remind you of your statement on page 191: "The most important qualities to visitors to all three areas were scenery, wildlife, and clean air [emphasis added]."

In regard to water quality, plowing the road from West Yellowstone to Old Faithful, and allowing buses and vehicles to travel that road during the wintertime will most definitely negatively affect the water quality in the park, based on your own premise, as stated on page 94:

"[Hydrocarbon pollution in water will initially persist on the surface and eventually settle in the water column, exposing fish and invertebrate populations."

When the huge berms of snow created by the plowing of the Old Faithful road melt, along with all of the deposited pollution from buses and cars, where will that snow go? Into the park's watershed. Your study of impacts on water quality needs to be expanded to include pollution potential presented by buses and vehicles during the winter.

(6) Infrastructure

At Idaho Falls in October, the cooperating agencies were instructed to consider the impacts to the park's infrastructure when formulating alternatives. We find little or no analysis of the impacts to the park's infrastructure regarding the preferred alternative. Specifically, we can find no costs for plowing the road from the West entrance to Old Faithful; no costs associated with the plowing impact on the condition of the road surface; and no costs associated with policing, emergency, accident response, delivery services and garbage hauling, to name a few.

We believe in maintaining park improvements at a minimum to ensure a pristine, wilderness park setting. If the park insists on building more beds, expanding sewage treatment facilities and providing overall more infrastructure to serve an ever-growing number of park visitors, it will fail to achieve its mandate. Rather, the park should increase its dependence on adjoining communities to provide those services, improvements, beds and infrastructure. The preferred alternative, in absence of data and analysis to demonstrate otherwise, will adversely impact the park's infrastructure.

We cite your conclusion on page 297:

"...There could be long-term adverse effects if the demand for available access to Old Faithful exceeds the capacity for parking at that location. Although oversnow use would be eliminated between West Yellowstone and Old Faithful, the introduction of alternative modes of transportation would surpass the level of access currently realized through existing transportation modes."

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Your analysis on page 296 goes into detail on the parking requirements for the preferred alternative. It fails to mention day use facilities, sewage treatment, and medical and police services. We cite page 483, where you state:

"Under Alternative B, there may be increased impacts to the Old Faithful area if winter pedestrian use increases due to enhanced access for this type of visitor."

You also briefly address lodging facilities on page 164:

"Most of these [beds] are not open during the winter months because of infrastructure vulnerability to freezing temperatures. The facilities were originally constructed in the 1930's and were never intended for winter use."

Clearly, increased winter use at Old Faithful will require extensive and costly improvements to existing infrastructure.

Finally, under "The Desired Condition" section, p. 5, the draft states:

"Further, these desired conditions should be facilitated by cooperative work between the National Park Service, other agencies, local and regional governments, communities, concessions, commercial operations, and the equipment manufacturing industry."

Gallatin County challenges the Park Service to demonstrate how that statement can be consistent with the preferred alternative.

CONCLUSION

As a cooperating agency, Gallatin County fervently desires to protect Yellowstone National Park consistent with its legal mandate. Far from reacting as a self-serving entity wishing only to further the economic interests of our constituents, we firmly believe in protecting the air and water quality; the wildlife viability; and the diversity of visitor experience. We also believe that the costs, both environmental and financial, should not be unduly placed on the park.

Plowing the road from West Yellowstone to Old Faithful makes no sense. It will further burden the already strained infrastructure of the Old Faithful area at a huge financial cost. (You provided little data on these costs.) Your own surveys show a huge cost to lost business in West Yellowstone and a lack of support from winter visitors. Your data on visitor experience demonstrates little support for a plowed road. Your wildlife data and analysis appear ambiguous and inconclusive as they relate to the preferred alternative. You consistently failed to provide a comparative analysis between "clean green" machines and the impacts of the proposed activities under Alternative B. In summary, using your own data, we find that Alternative B would detract from the visitor experience, adversely impact wildlife, air and water quality, overtax the park's infrastructure, and greatly harm the economy of the adjacent towns, principally West Yellowstone.

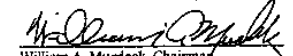
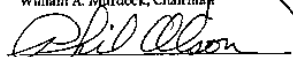
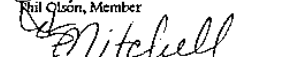
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You have done a very good job of coming up with close to the worst option imaginable. We leave you with this thought: Envision quotas of quietly humming snowmachines traveling at reduced speeds over snow on the road from West Yellowstone to Old Faithful only during daylight hours. No 12-ft. high berms, no noisy, smelly snowplows, cars or buses, no dangerous plowed corridors to entice or trap wildlife. No multi-thousand throngs milling about Old Faithful all day, all winter, clamoring to use the facilities. Clean air. Clean water. Quiet. A quality, diverse visitor experience, and undisturbed wildlife. This is achievable and desired by your constituents.

Alternative B is not the answer. Several of the other alternatives meet the above desired conditions much better.

Sincerely,

GALLATIN COUNTY COMMISSION


William A. Murdock, Chairman

Phil Olson, Member

Jennifer Smith Mitchell, Member

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GALLATIN COUNTY, MONTANA (See also responses to Paul Kruse, Representative of Cooperating Counties)

Page 1. There is no requirement in CEQ regulations (§1502.14) to justify a preferred alternative, just to name one or more alternatives as preferred in the DEIS if there is a preference. The purpose of identifying the preferred alternative is so agencies and the public can understand the lead agency's orientation (§1502.14(e)). The entire comment letter is a criticism of the preferred alternative, and as this comment indicates, the purpose is to convince the NPS to "select a different proposed action." In fact NPS will indicate a new preference in the FEIS, which technically addresses this point.

NPS acknowledges the commenter feels there isn't sufficient support for selecting the preferred alternative, and that there is disagreement on the nature and level of impacts. The commenter should note that a final decision has not yet been made in consideration of the full range of alternatives in an FEIS. Comments about the rationale for or against the preferred alternative are given too much weight at the expense of the range of alternatives. The rationale for the preferred alternative does not set the scope of analysis. NEPA (CEQ Regulations) does not make stipulations about the rationale for selecting a preferred alternative in an EIS; in fact there is no requirement for stating the rationale in an EIS. It stipulates that in a final EIS, a preferred alternative must be identified. The statement of preference for one or more alternatives in a draft EIS is discretionary, depending upon whether the agency has a preference at that point (§1502.14(e)).

Therefore, the identification of a preferred alternative in a DEIS should be regarded by the public as extremely tenuous. This is because an EIS is to serve as a means of assessing impacts of proposed agency actions "rather than justifying decisions already made" (§1502.2(g)). The FEIS preferred alternative may be viewed more as a "precursor" decision, which will only become final in a Record of Decision that expresses the rationale for the choice. In any case, it is clear that merely the expression of a preferred alternative, by itself, can in no way invalidate the entire EIS analysis. The decision maker can select any of the alternatives in a Final EIS through consideration of a variety of factors, including but not limited to environmental impacts.

The bulk of the comments in this letter express why alternative B is not acceptable to the writer, using much of the impacts disclosure in the DEIS. We reiterate the purpose of an EIS – to disclose impacts of the proposed action and alternatives to it. NPS will respond directly to any other comments that refute the analysis in general. Where the County's assessment of impacts disagrees with that of the NPS, both viewpoints will be represented – as in the DEIS. Though the County's strong objection to alternative B may be persuasive in the final decision (see above), there is no information presented in this letter that would alter the essential features of that alternative or remove it from consideration.

A final note is that the comments in this letter have been directed at the preliminary draft EIS that was provided to cooperating agencies for comment before publication of the DEIS. The DEIS was adjusted to respond to substantive comments from the cooperators. Therefore, page references in the letter and some of the content does not actually apply to the DEIS.

Page 2. NPS affirms its statement that this impact is negligible, considering the regional economy. The DEIS states on page 198 that a \$12.4 million loss in a \$12.7 billion economy is negligible, especially as this is a worst-case scenario. It is likely that some visitors would continue to come to the GYA in the winter, and it is likely that others would choose to take advantage of a different type of experience. The DEIS goes on to state that despite the negligible loss in a regional economy, the impact would be felt mostly in small communities surrounding the parks. The same information is conveyed in the DEIS in relation to the 3-state regional economy. NPS is responding to cooperating agencies that feel that the economic analysis on 17 counties dilutes the effects for counties that are most immediately affected. NPS will determine and report on the projected impacts for the 5-county area.

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Page 2. In many other respects, the commenter might be appreciative of a dispassionate analysis. The cooperators are nearly unanimous in requesting NPS ignore the emotional content on wildlife, air, water and other “protection” issues and rely instead on “good science.” NPS has a more optimistic view about the business community in general and, as stated, feels that it will find ways to adapt and profit from its proximity to public lands. NPS also notes from hearings and other comments that some of that community does not agree with the commission nor support NPS in addressing critical resource issues.
Page 3. Re: Preferred alternative. Partly in response to the overall non-support of plowing the road, NPS expresses a new preferred alternative in the Final EIS. This alternative would provide oversnow motorized access from West Yellowstone to Old Faithful, and allow visitors to experience the park by snowcoach.
Page 3. Re: Alternative B, affordable winter visitation. The stated purpose of plowing the road (DEIS, page 28) is to “improve affordable access.” A thorough reading of the EIS would reveal that a required impact topic in an EIS is to evaluate the effects of a proposed action on socially or economically disadvantaged populations (DEIS, page 80). These populations are characterized on page 90 in the DEIS, and the effects on those populations are disclosed in the socioeconomic section for each alternative (DEIS, pp 176, 199, 224, 245, 260, 274, 288). The stated impacts on socially or economically disadvantaged populations are not used as “justification” for plowing in alternative B, although there would certainly be some economic and environmental justice in doing so.
Page 3. Re: Visitor experience. The commenter is encouraged to separate the criteria for selecting an alternative from the process of disclosing impacts for all alternatives. The decision criteria, or factors considered by the decision maker in making his or her choice, will be explained at the time a legal decision is made. Comments arguing about the rationale for the preferred alternative in the DEIS are most applicable to the decision that has yet to be made. Directly to the point of this comment, the new preferred alternative in the FEIS would limit winter visitors, would allow oversnow machine travel, and would eliminate noise and pollution from snowmobiles. Alternative B does the same, except that it would allow snowmobiles in the parks – except from West Yellowstone.
Page 4. Re: Natural quiet. The sound analysis will be more comprehensive for all alternatives in the FEIS.
Page 5. Re: Chronic harassment of wildlife. In part to address the issue of impacts from humans on wildlife, a carrying capacity study for visitor use will be completed in a timely manner after the Record of Decision (regardless of which alternative is decided upon) and the FEIS will set interim visitor use levels. More explanation of the carrying capacity issue will be included in the FEIS.
Page 5. Re: Potential for impacts. Impacts discussed in the section titled Unavoidable Adverse Impacts (DEIS page 317) are drawn from the explanation of assumptions and detailed analysis of alternatives in Chapter IV of the DEIS. NPS feels there is adequate support for the statement in question.
Page 5. Re: Cumulative impact analysis. The EIS and Plan are of a programmatic nature. It has been NPS’ expressed intent from the beginning of the process to prepare a programmatic Plan (§1508.18(b)(2) and (3)). This would be the purpose of preparing a “comprehensive EIS.” There should have been no illusions that a plan of this magnitude would be based upon detailed, site-specific data in order to make every decision possible relating to winter use. This programmatic approach is acceptable under the law. Such documents make decisions and allocations at a general level and defer many specific project decisions (implementing the plan) to a later date. Some site-specific decisions will require additional NEPA analysis and a new decision that is “tiered” (§1508.28) to, or supported by, the programmatic plan. For these analyses, the assessment of cumulative impacts must be done in accordance with the CEQ regulations.
Page 5. Re: Snowmobile emissions. The emissions analysis will be more comprehensive for all alternatives in the FEIS.
Page 6. Re: Water quality. The analysis of emissions impacts on snowpacks, water quality and aquatic resources will be updated in the FEIS using information not available for the DEIS.
Page 6. Re: Park infrastructure. Costs associated with winter use alternatives may be found in DEIS Appendix F (Vol. II).
Page 6. Re: Park improvements. As the commenter points out, there are impacts associated with the preferred alternative in the DEIS. There are impacts disclosed for all alternatives, as is the nature and purpose of an EIS. The commenter misses the point of the process and confuses the eventual decision with disclosure of impacts through the range of alternatives.